



Regulation 19 Representation - Dirty Lane Site (a), Brewwood

For: Boningale Homes Ltd

Report No. MAN.710.003.PL.R.003



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Local Plan Review Regulation 19 Dirty Lane Site 1, Brewood Representation

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For:	Boningle Homes Ltd.
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Contents

1.0	Introduction	4
1.1	Introduction	4
2.0	Site Context	5
2.1	Site Location	5
3.0	Site Characteristics	6
3.1	Flood Risk	6
3.2	Ecology	7
3.3	Heritage	7
3.4	Agricultural Land Classification	8
3.5	Topography	9
3.6	Landscape And Visual Impact	9
3.7	Public Rights of Way (PRoW)	9
3.8	Proximity to Local Facilities	10
3.9	Pedestrian Access to Education	10
3.10	Public Transport	12
3.11	Access	12
3.12	Greenbelt	12
4.0	Local Plan Review Context and Spatial Strategy	13
4.1	Brewood Spatial Strategy (Regulation 19 Local Plan Review Context)	13
4.2	Site in context of Spatial Strategy	13
4.3	Capacity, Suitability and Availability	15
5.0	Conclusion	16
5.1	Summary	16

Tables and Figures

Figure 1: Site Location (site denoted by red line).....	5
Figure 2: Environment Agency Flood Risk Map (Rivers and Sea)	6
Figure 3: Environment Agency Surface Water Flood Risk Map	6
Figure 4: Map of Ecological Designations	7
Figure 5: Historic England Map (site denoted by red line and listed buildings denoted by blue triangles)	8
Figure 6: Extract: Natural England - Agricultural Land Classification Map (site denoted by red star)	9
Figure 7: Extract - Staffordshire County Council Public Rights of Way Map.....	10
Figure 8: Extract - Staffordshire County Council Walk Access to Primary and First Schools (2021).....	11
Figure 9: Extract Staffordshire County Council Walk Access to Middle Schools (2021).	11
Figure 10 Extract: South Staffordshire District Council Local Plan Review Publication Map 2022 - Brewood proposed allocations.....	13
Figure 11 Extract: LUC Greenbelt Study	14

1.0 Introduction

1.1 Introduction

1.1.1 This representation to the South Staffordshire Local Plan Review Regulation 19 consultation has been prepared by Enzygo Ltd. on behalf of Boningale Homes Ltd. Boningale Homes have different land interests across the South Staffordshire District.

1.1.2 This representation contains information relating to the following land parcel:

- BH027a Dirty Lane Site 1 (SHELAA Site Reference Site 076)



2.0 Site Context

2.1 Site Location

2.1.1 The site is located in a parcel of paddock land off Dirty Lane, nr. Postcode ST19 9BX. The site is located at grid reference X: 388157 Y: 308542. The site measures 0.71 hectares / 1.756 acres (Figure 1).

2.1.2 To the immediate north of the site lies Brewood Church of England Middle School, separated from the site by Dirty Lane which runs adjacent to the northern site boundary. A mature hedgerow and cluster of mature trees line the northern boundary, offering screening to the site. A residential dwelling, Greenfields Bungalow, lies to the immediate east of the site. Further residential dwellings are located approximately 0.13km east of the site off Dirty Lane and Dean Street in the town settlement of Brewood. The Shropshire Union Canal bounds the site to the west, alongside an existing line of trees running along the western site boundary. Agricultural fields bound the site further west and to the south.

2.1.3 The site is located within the Green Belt.

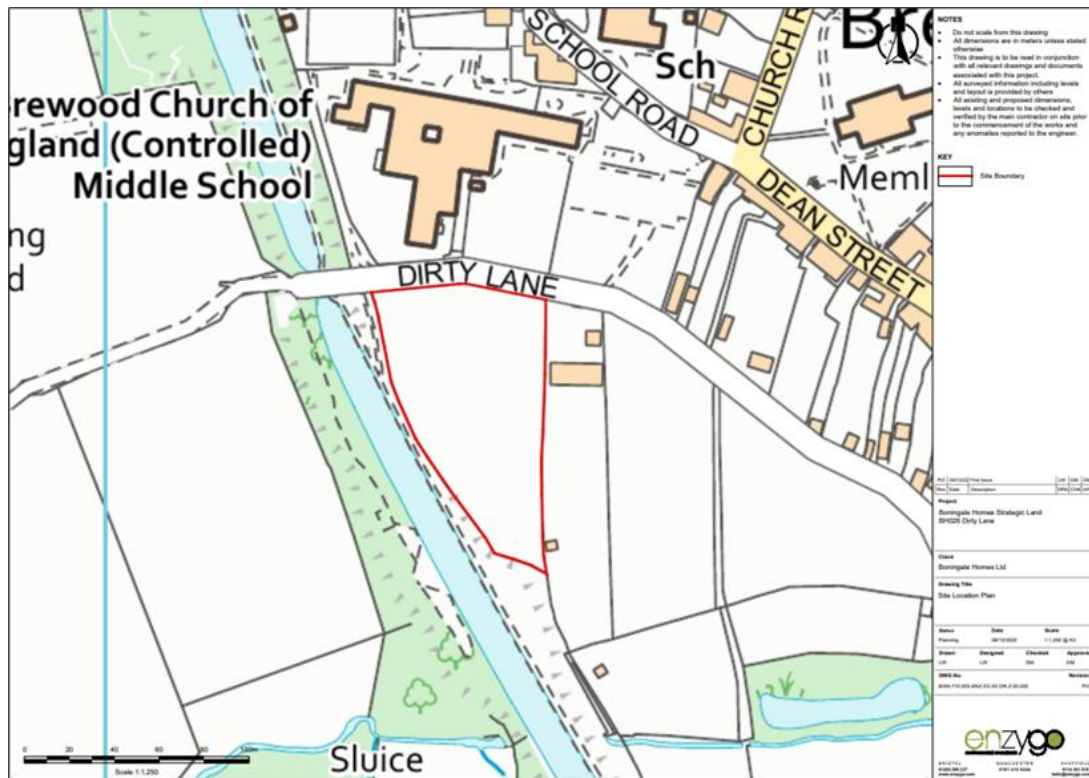


Figure 1: Site Location (site denoted by red line)

3.0 Site Characteristics

3.1 Flood Risk

3.1.1 The site is located within Flood Zone 1 (low risk of fluvial flooding) as illustrated in the Environment Agency’s online flood map records (see Figure 2). Land approximately 80m south of the site is located within Flood Zone 3 and is at a high risk of flooding. In regard to surface water flooding, the site itself is not at risk of surface water flooding, although land to the south is at a medium to high risk of surface water flooding (Figure 3). There are no known drainage constraints which would form insurmountable barriers to the delivery of this site subject to detailed design and consideration of infrastructure capacity.

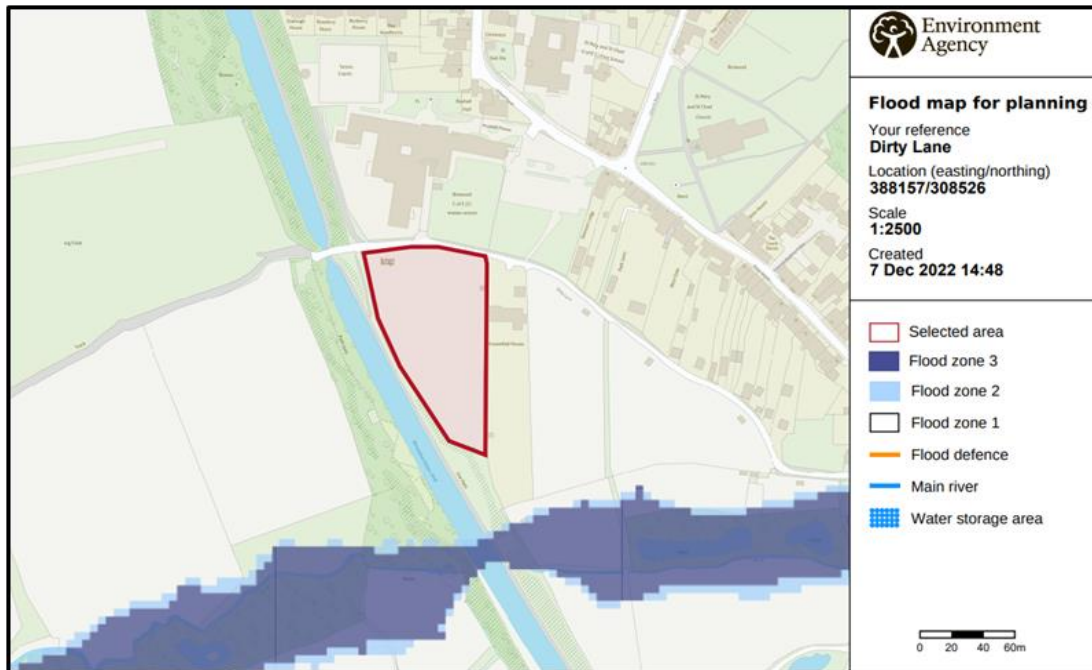


Figure 2: Environment Agency Flood Risk Map (Rivers and Sea)



Figure 3: Environment Agency Surface Water Flood Risk Map

3.2 Ecology

3.2.1 There are no statutory ecological designations within the site boundary (Figure 4). The closest ecological designation to the site is:

- Big Hyde Rough (SSSI) – approximately. 1.4km west of the site.

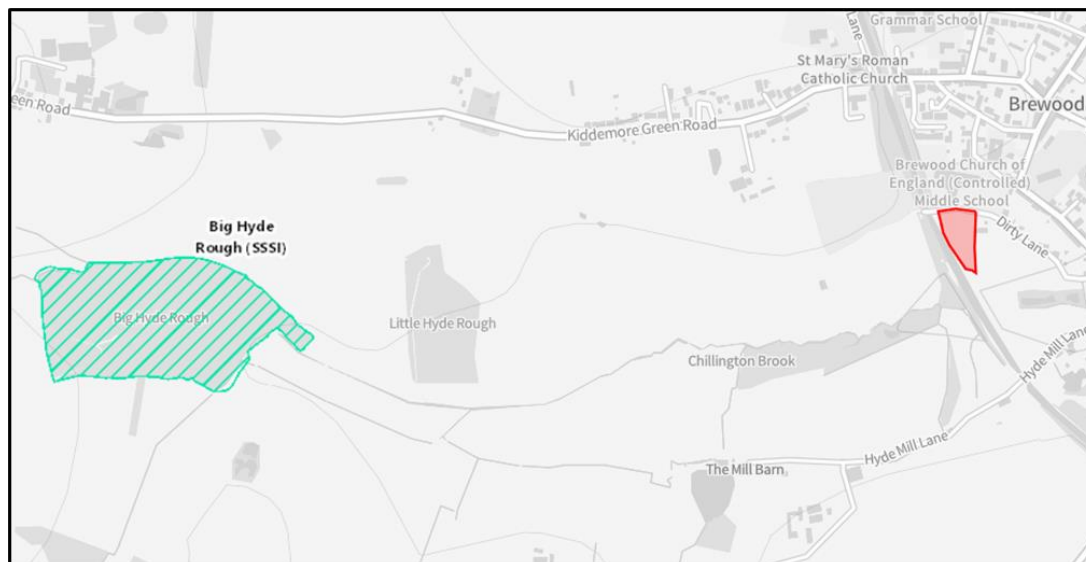


Figure 4: Map of Ecological Designations

3.3 Heritage

3.3.1 The site is not within a Conservation Area. There are no listed buildings or other defined heritage assets within the boundary however, there are approximately 65 listed buildings within a 1km buffer of the site. Those closest to the site are:

- Shropshire Union Canal Number 13 (School Bridge) (Grade II Listed) – approx. 30m west;
- Rushall Hall (Grade II Listed) – approx. 0.12km northeast;
- Chantry Cottage (Grade II Listed) – approx. 0.13km northeast;
- The Chantry (Grade II Listed) – approx. 0.11km northeast; and
- Westgate, Forecourt Wall and Gate Piers (Grade II* Listed) – approx. 0.12km northeast.

3.3.2 Chillington (Grade II* Registered Park & Garden) lies approx. 1km south of the site.

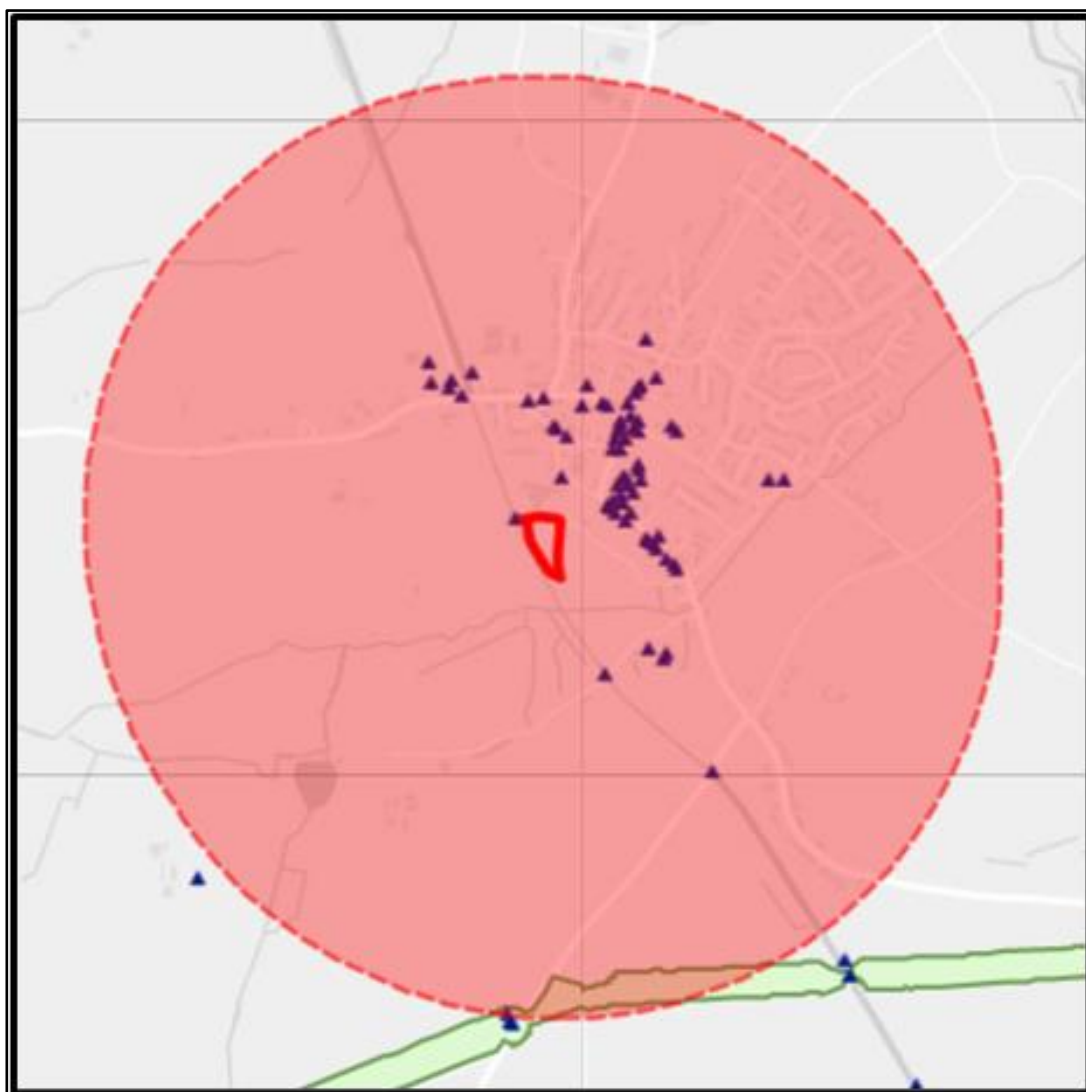


Figure 5: Historic England Map (site denoted by red line and listed buildings denoted by blue triangles)

3.3.3 HESA scores as part of the SHELAA assessment for the site indicate the site comprises a green rating for direct potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required. The HESA scores the site an amber for indirect potential harm to the historic environment, indicating no significant effects which cannot be mitigated are at present predicted.

3.4 Agricultural Land Classification

3.4.1 The map from Natural England (Figure 6) shows the site to be Grade 3 (good to moderate quality agricultural land); the wider area falls within Grade 3 with areas of Grade 2 throughout.

3.4.2 The Natural England Map does not subdivide ALC into Grade 3a or 3b.

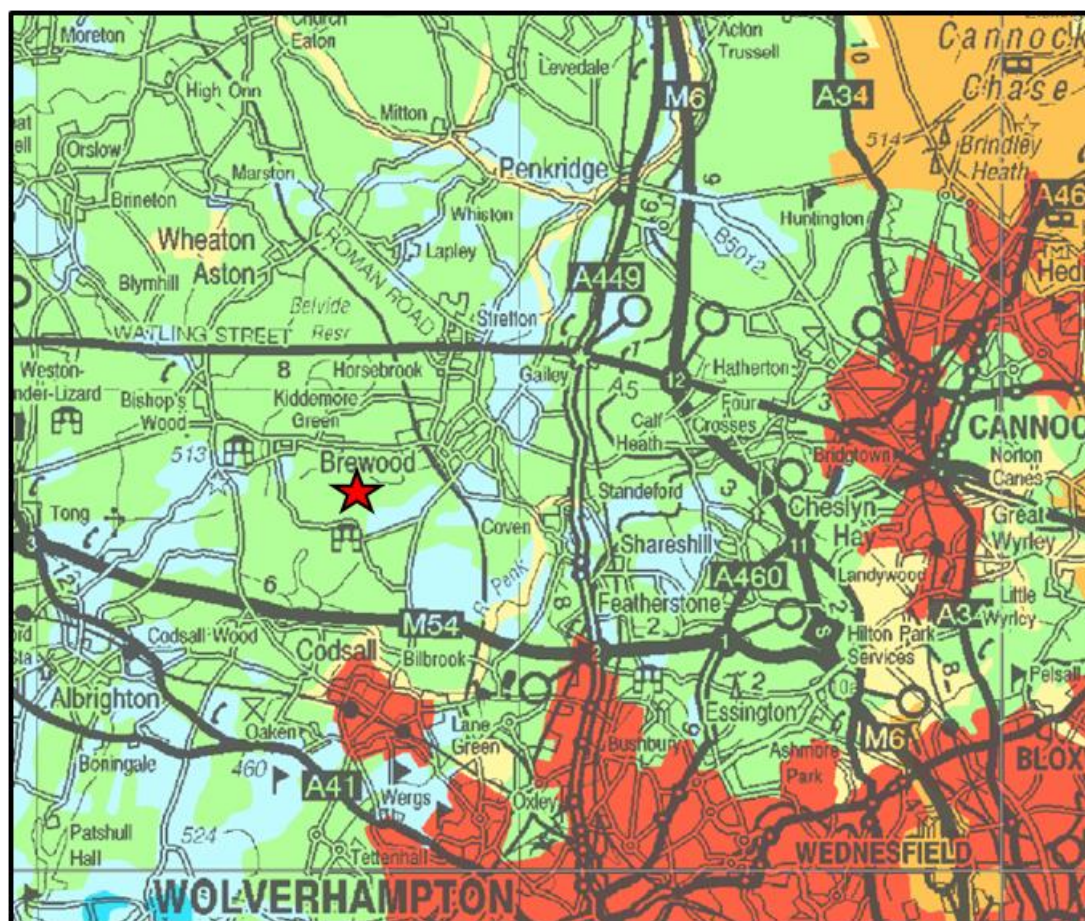


Figure 6: Extract: Natural England - Agricultural Land Classification Map
(site denoted by red star)

3.5 Topography

3.5.1 The site is relatively flat. It is therefore considered that the development of the site is not constrained by topography.

3.6 Landscape And Visual Impact

3.6.1 The site lies to the south of Dirty Lane of which features residential dwellings, lying to the northeast of the site's northern boundary. The properties are separated from the site by the road and existing hedgerow vegetation, which offers natural screening to the site. Greenfield House is situated to the immediate east of the site, separated by mature trees and a hedgerow.

3.6.2 The Shropshire Union Canal bounds the site to the west with an existing intervening line of trees running along the western site boundary. Agricultural fields bound the site further west and to the south.

3.6.3 Overall, the site benefits from existing boundary vegetation which provides a moderate degree of screening to the site from the immediate surroundings.

3.7 Public Rights of Way (PRoW)

3.7.1 There are no PRoWs within the site boundary, however there are several within the vicinity of the site. The Breewood and Coven 7 (Footpath) runs along the northern site boundary in

a westerly direction and the Brewood and Coen 3 (Footpath) runs north to south approximately 80m east of the site.

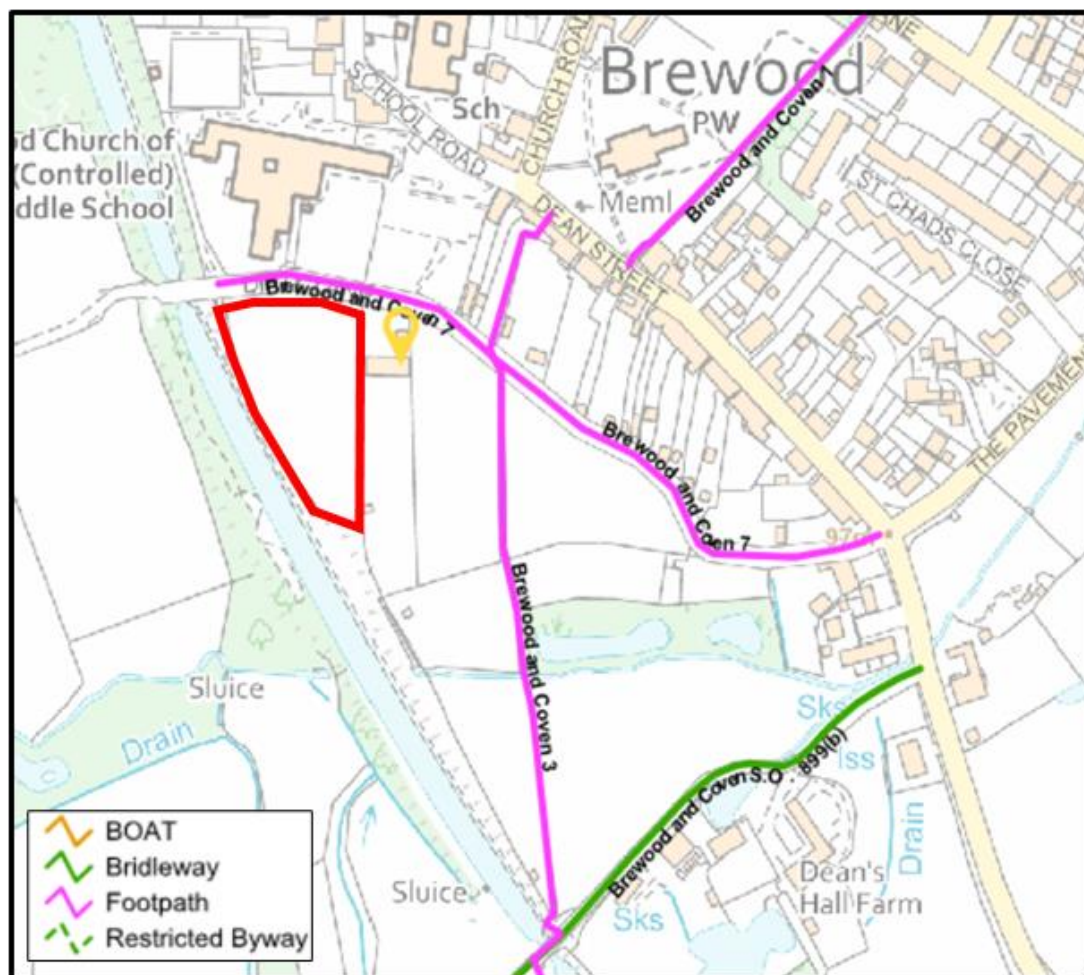


Figure 7: Extract - Staffordshire County Council Public Rights of Way Map

3.8 Proximity to Local Facilities

3.8.1 The distance people need to travel in order to reach employment, facilities and services will inevitably affect the mode of travel and the sustainability of a location.

3.8.2 In regard to this site, the nearest village centre is that of Brewood, located approximately 0.4km to the north. The Brewood C of E Middle School lies 10m north of the site and the St Mary & St Chad First School lies approx. 150m northeast, beyond the middle school. The village also features a church, 'Saint Mary the Virgin and Saint Chad', which lies to the northwest of the site. There are a number of bars and restaurants within Brewood, alongside recreational grounds such as Brewood Tennis Club, Football Club and Cricket Club.

3.9 Pedestrian Access to Education

3.9.1 The location and walking distance to primary and first schools shown on Figure 8. The site lies on the boundary of the yellow (0-10 minutes) walking distance zone for access to primary and first schools. The site is also located on the edge of the yellow zone (0-10 minutes) for access to middle schools as shown on Figure 9.

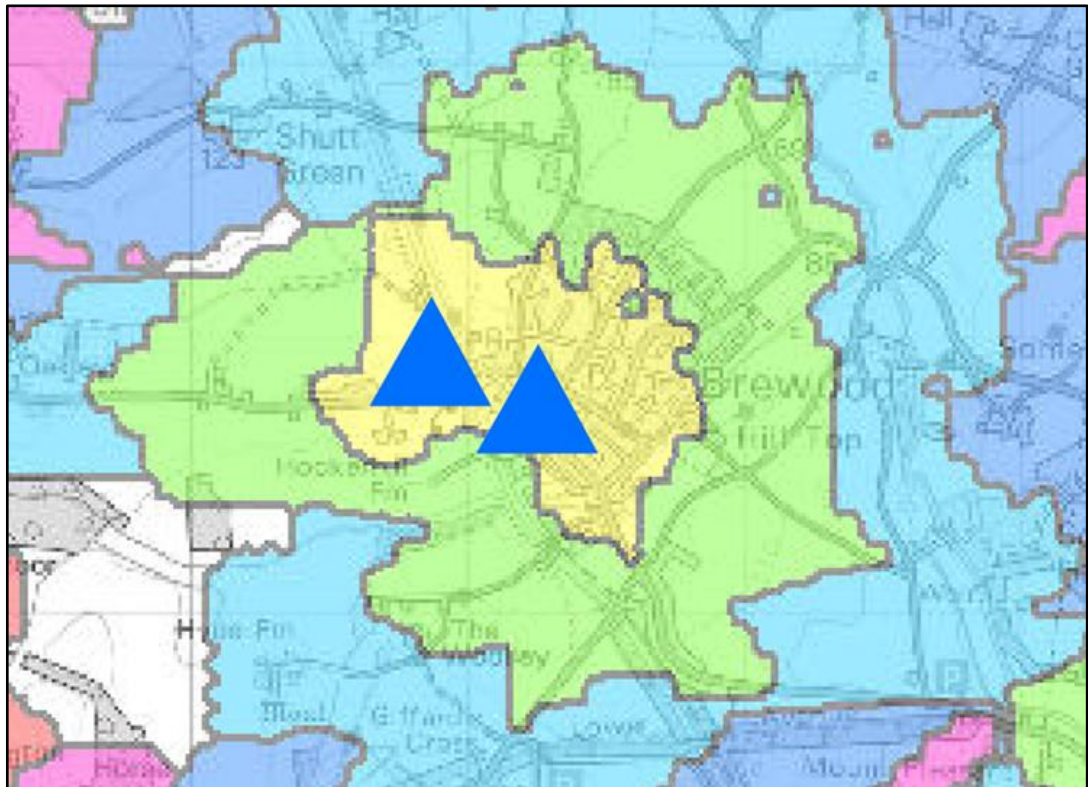


Figure 8: Extract - Staffordshire County Council Walk Access to Primary and First Schools (2021)

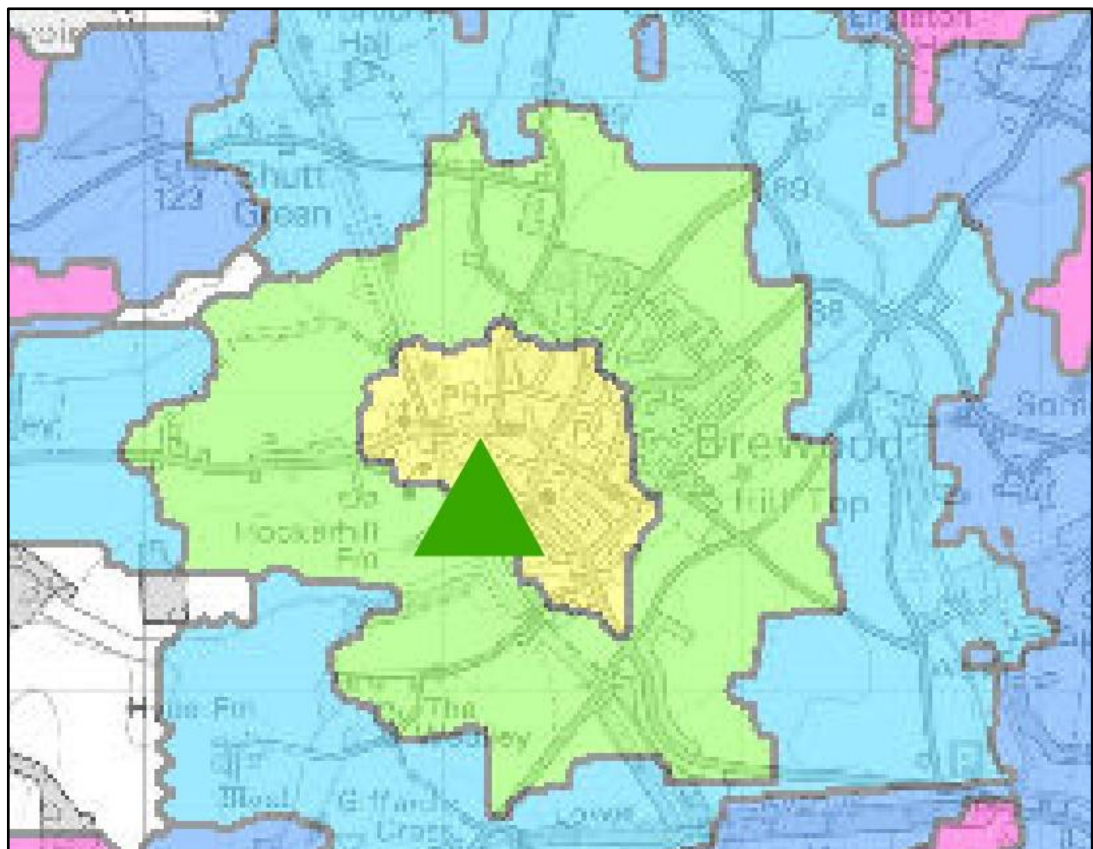


Figure 9: Extract Staffordshire County Council Walk Access to Middle Schools (2021).

3.10 Public Transport

3.10.1 The nearest bus stop to the site is the 878 (Stafford-Penkridge-Brewood-Wolverhampton) service, located on Coven Road approximately 350m east of the site boundary.

3.11 Access

3.11.1 A Preliminary Site Access Appraisal has been conducted by DLP Planning Ltd on behalf of Boningale Homes in order to review the development potential of land south of Dirty Lane, in Brewood, Staffordshire. The objective of this appraisal is to provide a high-level review of a likely site access strategy that may be required to serve the site for residential development.

3.11.2 This report takes into account current policy contained within the revised National Planning Policy Framework (NPPF), which was released in July 2021. The report also sets out a potential access strategy in accordance with the geometric requirements set out in 'Manual for Streets' (2007), DMRB CD123 and the "Staffordshire Residential Design Guide" (2000).

3.11.3 Further site investigations are required to confirm whether a safe and suitable access strategy can be achieved, owing to the status of the Brewood and Coven 7 footpath which runs to the north of the site, through which existing site access is afforded. This would inform both the development potential of the site as a whole and the number of residential units that may be deliverable.

3.12 Greenbelt

3.12.1 The site is located within the West Midlands Green Belt. Potential harm to the Green Belt on this site has been identified as moderate in the greenbelt assessment conducted by LUC on behalf of South Staffordshire District Council.

4.0 Local Plan Review Context and Spatial Strategy

4.1 Brewood Spatial Strategy (Regulation 19 Local Plan Review Context)

4.1.1 The Regulation 19 Publication LP notes the following for Brewood settlement at Para 5.32:

“5.32 Housing growth in the village will be delivered through limited land release alongside the delivery of the safeguarded land previously identified adjacent to the village. This approach balances the historic character of the village, the extent of Green Belt land in this area and the relative level of services and facilities in Brewood compared to other settlements in the district. It also recognises the potential for additional allocations to be made to address the acute local need for specialist elderly housing in this location.”

4.1.2 The proposed allocations for Brewood are shown on p36 of the Publication LP. Two housing allocations are currently proposed. These comprise the safeguarded land to the northeast of the settlement (part of SHELAA site 617) and a new allocation (SHELAA site 079) to the west of settlement which is currently located in the greenbelt. These are proposed to be allocated as follows:

- Four Ashes Lane (Safeguarded land, re-allocated). Residential. 63 dwellings. Part of SHELAA site 617.
- Land South of Kiddermore Green Road. Residential. 43 dwellings (including specialist housing). SHELAA Site 079.

4.1.3 The proposed allocations are shown on Figure 10 below



Figure 10 Extract: South Staffordshire District Council Local Plan Review Publication Map 2022 - Brewood proposed allocations

4.2 Site in context of Spatial Strategy

4.2.1 The site subject to this representation is located adjacent to the Tier 2 settlement of Brewood. Tier 2 settlements are recognised as providing access to a range of facilities, services and educational establishments in the local plan.

4.2.2 The SHELAA proforma for Site 076 states that the site is characterised by “Lesser Green Belt harm than the majority of land around the village (site is ‘moderate’)”.

4.2.3 The South Staffordshire Green Belt Study Addendum Final Report Prepared by LUC (August 2022) shows the location of the site in relation to surrounding land parcels (Figure 11). The brown shading denotes ‘moderate’ greenbelt harm, light blue shading denotes ‘moderate-high’ harm and dark blue shading denotes a ‘high’ harm rating. The site is located in the brown shaded area of parcel S32L to the northwest (moderate harm).

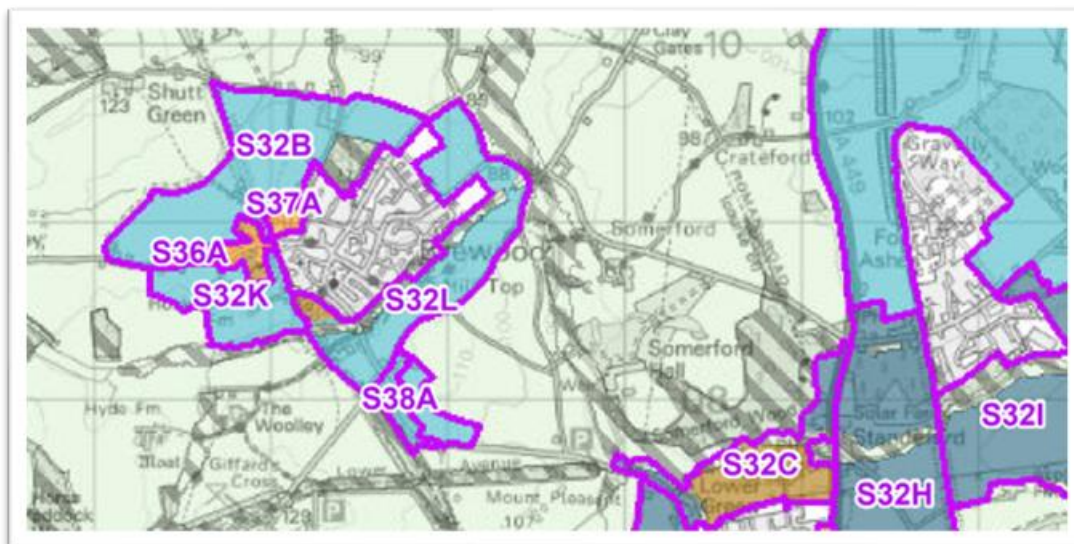


Figure 11 Extract: LUC Greenbelt Study

4.2.4 The LUC Green Belt study identifies that approximately 6% of land (or 5.3% of land excluding absolute constraints) within all promoted sites across the South Staffordshire District is classified as ‘moderate’ greenbelt harm. Considering all promoted sites across South Staffordshire District the LUC assessment identifies that approximately 91.2% of sites are collectively assessed as moderate-high, high, or very high greenbelt harm (92.3% excluding absolute constraints) as derived from the extract below.

Table 7.3: Total area of land assessed at each harm rating

Harm Rating	Total Area of Land (ha)	Percentage of land
Very High	2,656.02	29.7
High	3,414.6	38.1
Moderate - High	2,094.6	23.4
Moderate	537.0	6.0
Low - Moderate	170.1	1.9
Low	37.6	0.4
Very Low	46.6	0.5

Table 7.4: Total area of land within promoted sites assessed at each harm rating (excluding absolute constraints)

Harm Rating	Total Area of Land within Promoted Sites (ha) ²	Percentage of land ²
Very High	1,072.62	28.9
High	1,571.40	42.4
Moderate - High	779.00	21.0
Moderate	197.10	5.3
Low - Moderate	81.00	2.2
Low	7.00	0.2
Very Low	0.60	0.0

- 4.2.5 The Stage 2 Greenbelt Assessment for South Staffordshire (LUC, July 2019 Appendix 3, p492) in relation to the LUC identified parcel S32Ls2 states that:

“In the extreme west of the sub parcel, while Dirty Lane currently provides a relatively clear boundary to between urbanising uses and open land, extending the edge to the watercourse would provide a more consistent edge with the remainder of the southern boundary of the village. As such, the release would not weaken the Green Belt boundary, nor would it weaken the integrity of wider Green Belt land.”

- 4.2.6 The site presents an opportunity for an additional or alternative site under Policy SA5 of the local plan that would be consistent with the proposed spatial hierarchy and spatial distribution of sites around Tier 2 settlements, subject to the consideration of Green Belt boundaries under Policy DS1.

4.3 Capacity, Suitability and Availability

- 4.3.1 The representation site area is approximately 0.71 hectares and could contribute towards the Council’s commitment to supply 10% of homes on sites less than 1 hectare.
- 4.3.2 This section of the representation has demonstrated that the site is not known to be unduly constrained in terms of topography, ecology, flood risk or heritage.
- 4.3.3 Further consultation with the Local Highways Authority is recommended with regards to potential access arrangements for the site.

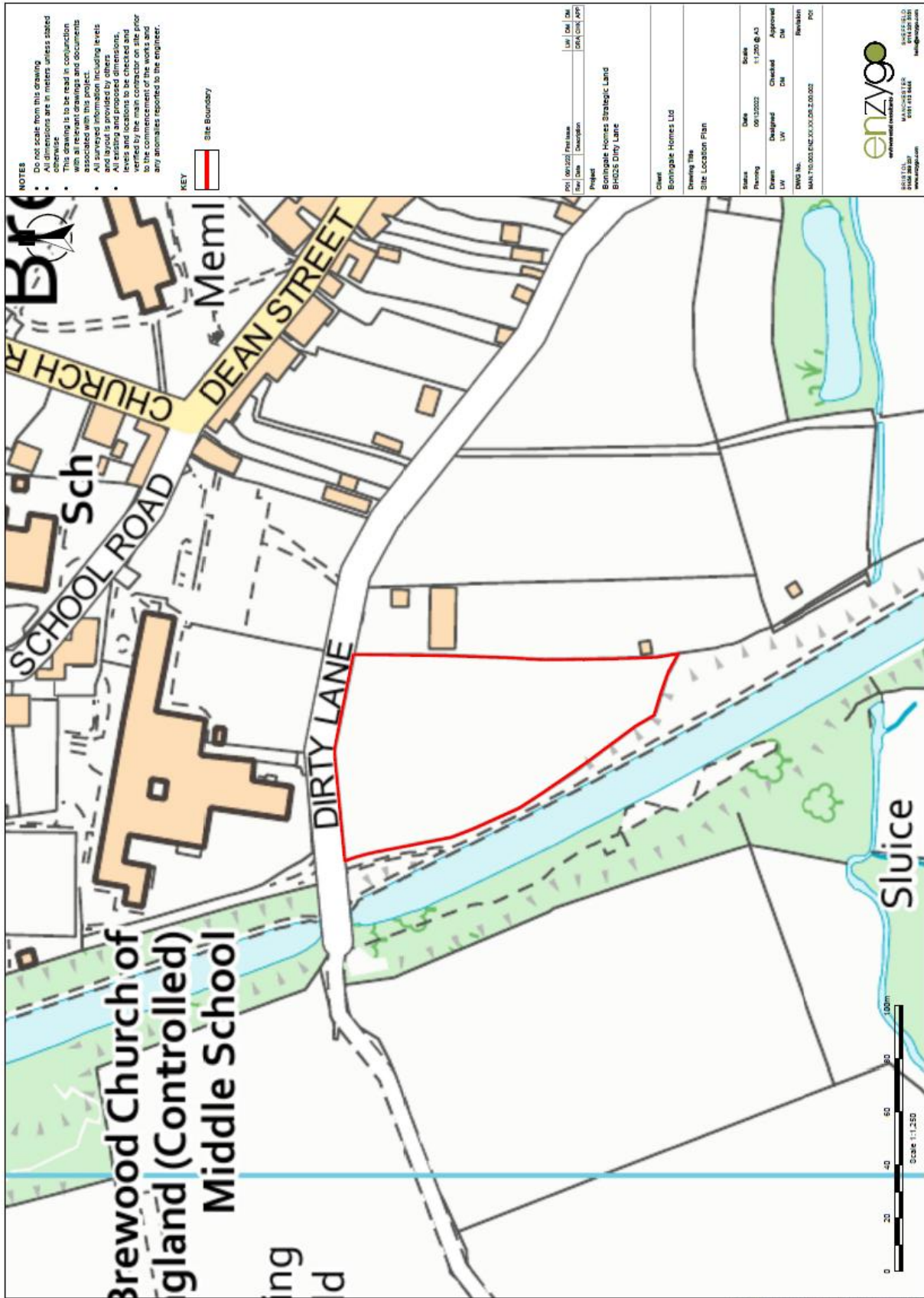
5.0 Conclusion

5.1 Summary

- 5.1.1 The site is located on a parcel of land off Dirty Lane. A school, canal and existing residential dwellings bound the site. The development would result in a loss of fields currently in use as paddocks.
- 5.1.2 The site is located entirely within Flood Zone 1, so is considered to have a low probability of fluvial flooding. The site is not shown to be at risk of surface water flooding based on Environment Agency surface water flood risk maps.
- 5.1.3 The site is not subject to statutory ecological designations, nor are there any within a 1km buffer. The nearest designated heritage asset is the Shropshire Union Canal Number 13 (School Bridge) (Grade II Listed) building which lies approximately 30m to the west.
- 5.1.4 There are no public rights of way within the site. However, a footpath lies immediately adjacent to the site's northern boundary and further Public Rights of Way are located within the surrounding area. The nearest bus stop to the site is the 878 (Stafford-Penkridge-Brewood-Wolverhampton) service, located on Coven Road approximately 350m east of the site boundary.
- 5.1.5 The site is located adjacent to the Tier 2 settlement of Brewood, in a sustainable location that provides access to a range of facilities, amenities and schools. The Brewood C of E Middle School lies 10m north of the site and the St Mary & St Chad First School lies approx. 150m northeast, beyond the middle school. The village also features a church, 'Saint Mary the Virgin and Saint Chad', which lies to the northwest of the site. There are a number of bars and restaurants within Brewood, alongside recreational grounds such as Brewood Tennis Club, Football Club and Cricket Club.
- 5.1.6 The site is located within the West Midlands Green Belt. Compared to other potential sites around Brewood village and the wider South Staffordshire area, this Site is considered to make a limited contribution to the purposes of the Green Belt, as informed by the LUC Green Belt Assessment which concludes that the release of this parcel of land would not weaken the Green Belt boundary or the integrity of wider Green Belt land.
- 5.1.7 The site is considered potentially suitable as an allocation for residential development in the local plan and could contribute towards the Council's commitment to supply 10% of homes on sites less than 1 hectare.
- 5.1.8 Further site investigations are however required to confirm whether a safe and suitable access strategy can be achieved, owing to the status of the Brewood and Coven 7 footpath which runs to the north of the site, through which existing site access is afforded. This would inform both the development potential of the site as a whole and the number of residential units that may be deliverable.

6.0 Appendices

Appendix 1 : Site Location Plan





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